

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

UBIQUITI INC., f/k/a Ubiquiti Networks,
Inc.,

Plaintiff,

v.

CAMBIUM NETWORKS, INC.;
CAMBIUM NETWORKS, LTD.;
BLIP NETWORKS, LLC;
WINNCOM TECHNOLOGIES, INC.;
SAKID AHMED; and
DMITRY MOISEEV

Defendants.

Civil Action No.: 1:18-cv-05369

JURY TRIAL DEMANDED

Hon. J. Gary S. Feinerman

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 26.2 and the Agreed Confidentiality Order entered in this case (Dkt. No. 102), Plaintiff Ubiquiti, Inc. (“Plaintiff”), by and through its undersigned counsel, respectfully requests that the Court grant Plaintiff’s Motion for Leave to File Under Seal (the “Motion”) Exhibits A & B to Plaintiff’s Motion to Compel De-Designation of Defendants’ Attorneys’ Eyes Only Production and for Sanctions.¹ In support of the Motion, Plaintiff states as follows:

WHEREAS, the above-named Defendants have designated all documents produced in this action as “CONFIDENTIAL RESTRICTED – ATTORNEYS’ EYES ONLY” under the Agreed Confidentiality Order entered in this case.

¹ Pursuant to the terms of the Fourth Amended General Order In Re: Coronavirus COVID-19 Public Emergency (Dkt. No. 131), Plaintiff has noticed this motion for presentment at the earliest available date of July 15, 2020 – which date may be further subject to any individual orders entered by this Court with respect to the scheduling of such presentment hearings.

WHEREAS, Plaintiff has filed a Motion to Compel De-Designation of Defendants' Attorneys' Eyes Only Production and for Sanctions, and in support thereof attached certain specific production documents that Defendants have designated as "CONFIDENTIAL RESTRICTED - ATTORNEYS' EYES ONLY" as Exhibits A & B.

WHEREAS, Plaintiff seeks to file the above-referenced production documents under seal in accordance with the terms of the Agreed Confidentiality Order pending the Court's ruling on its Motion to Compel De-Designation of Defendants' Attorneys' Eyes Only Production and for Sanctions.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that the Court grant leave to file the above listed documents under seal.

Dated: May 26, 2020

Respectfully submitted by:

FOX SWIBEL LEVIN & CARROLL LLP

/s/ Erik J. Ives

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 26, 2020, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which is also served upon counsel for all parties of record.

/s/ Erik J. Ives
Erik J. Ives